



Shell Oil Products US

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April 30, 2015

CERTIFIED MAIL RETURN RECEIPT REQUESTED 7013 2250 0001 8744 0422

Mr. Javier Morales
U.S. EPA Region 10
1200 Sixth Avenue, Suite 900, OCE-084
Seattle, WA 98101

Dear Mr. Morales:

Subject: Risk Management Plan (RMP) Information Request – March 19, 2015

Equilon Enterprises LLC's Puget Sound Refinery (PSR) is submitting the information included with this letter in response to the Information Request (the Request) sent from EPA Region 10 in a letter dated March 19, 2015. PSR received that letter on March 24, 2015, and a response was originally due 30-days from that date, which is April 23, 2015. However, an email from you dated April 21, 2015, approved a 7-day extension, making the due date April 30, 2015. This response is based on our review of on-site documents and information that could be compiled within the time provided to respond.

Please note that certain documents and responses marked "Confidential Business Information" are included in folders and files marked confidential on the enclosed USB drive and may be disclosed only to those government employees having a bona fide need for access to the document(s), and may not be disclosed or made available to any member of the public in any form, whether directly or indirectly, or by summary or analysis. These documents and our responses contain proprietary, trade secret, and confidential business information (collectively CBI) that is protected by a variety of laws, including without limitation, 5 U.S.C. § 552, 18 U.S.C. § 1905, 40 C.F.R. Part 2, §§ 68.151 and 68.152, 29 U.S.C. § 664, and 29 C.F.R. § 1903.9. We request that the identified CBI be protected from disclosure permanently. This CBI represents internal company work processes that provide a competitive advantage to our company, and is subject to internal confidentiality requirements, including but not limited to, employees agreeing to manage such company information as confidential.

PSR responds to the Request to the extent it seeks information authorized by Section 114 of the Clean Air Act (the "Act"), 42 U.S.C. § 7414, but objects generally to the Request on the following grounds:

1. PSR objects generally to the Request on the grounds and to the extent that it is overly broad and burdensome, or is seeking information not authorized by the Act.
2. PSR objects generally to the instructions, terms, and questions contained in the Request on the grounds that they are irrelevant, vague, unduly burdensome, and/or unreasonably broad.

3. PSR objects to the form of requests phrased such that any answer would appear to concede liability. PSR is providing this information in the spirit of cooperation and by responding to the following questions, PSR does not concede to liability under the Clean Air Act or EPA regulations thereunder regarding any of the information provided.
4. PSR specifically objects to information request No. 6 as over-broad, vague, and ambiguous because its request uses the undefined, overly-broad language "all the incident investigations" and "all resolutions and corrective actions." We appreciate the clarification provided by EPA subsequent to the letter, and have answered the questions to the best of our ability consistent with our understanding of EPA's clarified request, but the scope of the request as written remains unclear, and PSR requests an opportunity to discuss the response if EPA believes additional information is required.

This response is based on available information and our best understanding of the information requested. PSR reserves the right to amend its response if additional or different information is subsequently discovered.

Subject to and without waiver of its objections, PSR's response to the six RMP specific questions in Part C, Enclosure 1 of the Request, is provided below and included in the attached USB drive as referenced below with pertinent documents for certain questions.

Q1: The legal owner of the Puget Sound Refinery is Equilon Enterprises LLC (doing business as Shell Oil Products US).

Q2: Shell Puget Sound Refinery; 8505 South Texas Road, Anacortes, Washington.

Q3: As of the date of this letter there are 2,139 full-time Equilon Enterprises LLC (Equilon) employees. There are currently 477 full-time Equilon employees at the PSR facility. Although the company-wide estimated total number of contractors for Equilon is not readily available, at PSR it is estimated that there were on average approximately 939 contractor workers per day in 2014. This value was estimated using total contract hours reported as worked divided by 2000, the typical labor hours per year for an individual. This 2014 value is higher than a typical year due to a large maintenance turnaround activity conducted in 2014. Although the average will vary depending on the circumstances, there was an average of 536 contractors per day for March 2015, which is a more typical average when there has been no larger maintenance turnaround activity. These contractor numbers do not include contract service workers such as delivery truck drivers, restroom services, food catering companies, etc. that may be on-site for short periods of time on any given day.

Q4: See the included USB drive folder (RMPQ4 PROCESS), which includes documents considered Confidential Business Information and marked CONFIDENTIAL. This folder contains a process block flow diagram of PSR (CONFIDENTIAL PSR Plant Block Diagram). The unit flow rate for each process unit is shown on this diagram. The specific RMP compounds that are present in each listed process unit above the RMP Threshold Quantity can be found in the PSR RMP document included in this folder (RMP May 2014). This folder also includes a flow diagram of the PSR flare system (CONFIDENTIAL FlareIso).

Q5: See the included USB drive folder (RMPQ5 MAINT PROCEDURES), which includes documents considered Confidential Business Information and marked CONFIDENTIAL. This question asks for industrial standards used for maintenance of the 'scrubber units' connected to the PSR system. Because there are no 'scrubber units' on the PSR flare system, Tim Figgie of our office contacted you by phone to clarify this request. During that call it was determined that you were interested in the knock out (KO) drums, seal pots and piping equipment on our flare system. The industrial recommended practices used

for inspection and repair of this equipment include API RP 510 for pressure vessels and API RP 570 for piping. These procedures (documents API-RP-510 and API-RP-570) are found in the referenced folder along with the Plant Procedure that references and describes the use of these API standards (CONFIDENTIAL PEIPOL000 2) and a copy of the PSR "R"-stamp certification (CONFIDENTIAL 2013 R Stamp Manual). The "R"-stamp is a requirement of the Washington Department of Labor and Industries that requires repairs to pressure vessels meet the National Board Inspection Code (NBIC). All flare KO drums and seal pots are considered NBIC code vessels and are repaired and maintained consistent with the NBIC code, as applicable. Included in the referenced folder is the current edition of the Washington State Codes (WAC BoilerLawBook).

Employees that are or may be involved in the development and review of these procedures vary on a case-by-case basis and include, or may include, for example: Dean Overman, Pat Towell, Matthew LeCren, Dave Theusen, Parker Bryant, Chuck Hegland, Glen Gallo, Scott McPherson, Robert Towell, Lisa Claybo and Brent Welsh of the Pressure Equipment Inspection (PEI) Department. The PEI Department Manager is assigned the role of signing off on the finalization and issuance of the inspection procedures and policies.

PSR has also included copies of the East Flare shutdown operating procedures in use on the day of the odor incident, February 20, 2015 (CONFIDENTIAL 19FLARETA004 - Master). These procedures are being provided under the assumption that EPA is interested in reviewing flare operating procedures at the time of the odor incident, as well as maintenance procedures.

Operating procedures are written by subject matter specialists, who are typically qualified unit operators within the PSR Learning & Development Department, and approved by the Unit Production Specialist. Once the procedures are written, training is provided by the unit trainer to all operators that may need to use those procedures. The Operators recertify their understanding of these procedures every 3 years. In the case of the flare system, the current unit trainer is Todd Ramsay. The L&D Department Manager is Teri Mandemaker and the Training Supervisor is Janita Alto. The current flare Production Specialist is Debbie Thompsen.

Q6: See the included USB drive (folder RMPO6 INVESTIGATIONS), which includes documents considered Confidential Business Information and marked CONFIDENTIAL. PSR received some clarification of this question in an email from you to Tim Figgie dated April 3, 2015. In that email you requested not only incidents that meet the RMP 68.81 Incident Investigation criteria but also releases of RMP substances (listed in Enclosure 2 to EPA's letter), including 'near misses and minor incidences'. PSR had no incidents that meet the RMP incident criteria in 40 CFR 68.81. Therefore, per EPA's subsequent email, the incident investigations provided in the referenced folder are all in the category of 'near misses and minor incidences' involving the listed RMP substances.

The referenced folder in the USB drive has one subfolder for each investigation containing certain documents considered Confidential Business Information and marked CONFIDENTIAL. The number in the folder name corresponds to the internal "Fountain Incident Management" (FIM) investigation number. Within each folder is the incident report, which includes an incident description and recommended corrective actions, if any. In some cases there are additional documents in these folders such as 'timeline.vsd' or 'causetress.vsd'. These working documents are generated as part of the investigation and may be referenced in the report document. Also within each folder, the status of corrective action(s) is described in a separate document.

The signed Statement of Certification provided in Enclosure 4 of the information request can be found in Attachment 1.

Contact Mr. Tim Figgie at 360-293-1525 if you have any questions related to this information.

Sincerely,

SHELL PUGET SOUND REFINERY

A handwritten signature in black ink, appearing to read 'Shirley Yap', written in a cursive style.

Shirley Yap
General Manager

TCF

Enclosure: USB drive and Attachment 1

cc: Ms. Suzanne Powers
U.S. EPA, Washington Operations Office
300 Desmond Dr. SE, Suite 102
Lacey, WA 98503

ATTACHMENT 1

Shell Puget Sound Refinery
RMP Information Request Statement of Certification

Attachment 1

Puget Sound Refinery
Shell Oil Products US
P.O. Box 62
Anacortes, WA 98221

INFORMATION REQUEST
STATEMENT OF CERTIFICATION

I certify that the enclosed responses to EPA's Information Request issued to Puget Sound Refinery, Shell Oil Products US are true, accurate, and complete. I certify that the portions of these responses which I did not personally prepare were prepared by persons acting on behalf of Puget Sound Refinery, Shell Oil Products US under my supervision and at my instruction, and that the information provided is true, accurate, and complete. I am aware that there are significant penalties for submitting false information in response to this Information Request, including the possibility of fine and imprisonment.



Signature

Chet E. Yeo

Printed Name

Health and Safety, Security and Environmental Manager

Title

April 30, 2015

Date